

U.S. DISTRICT COURT
 FOR THE
 DISTRICT OF MASSACHUSETTS

Michael Baez, plaintiff
 Michael Maloney, et. al.

CA # 05-11045-GAO

Plaintiffs Motion to
 Compel production of
Documents

Now comes the plaintiff, Michael Baez on the above entitled heading, pursuant to Fed. R. Civ. ~~proc~~ 34, request that this Honorable court order the defendants to provide him with the listed Documents herein within a 30 day period so that he may use these documents as exhibits. Defendants have failed to respond to the "good Faith" request.

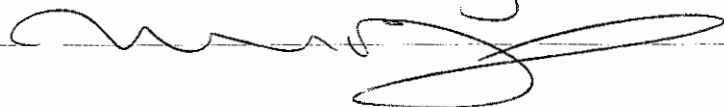
1) Any and all policies and codes relating to use of force moves.

2) All Staff Incident reports written in regards to the extraction Team forced move on plaintiff on 6/26/02.

3) Copy of the Special management Unit (smu) Rules and Regulations.

- 4) Copy of All Color photographs taken by JPS in regards to the extraction team incident including photographs of the plaintiff, his cell and the unit itself.
- 5) Copy of inventory list of all property taken out of plaintiff cell during this extraction.
- 6) Copy of all JPS interviews in regards to inmates ~~statements~~.
- 7) Copy of complete medical files of plaintiff.
- 8) Copy of All videotapes taken during this extraction team forced move.
- 9) Copy of listing of all personal staffs and medical staffs names etc. who were present during this force move as a supervisor.
- 10) Copy of All Defendants personal files in regards of them being Disciplined or any charges of abuse upon inmates.

11) Copy of Results of Internal Investigations
Done in regards to this incident.

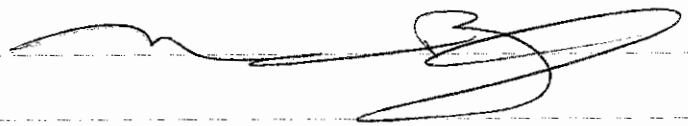
Respectfully Submitted,


Michael Baer w69027
PO Box 100
So. Walpole, MA
02071-0100

Date: 12/28/05

Certificate of Service

I, hereby certify on this 28th day of December 2005, I served a true copy of the foregoing upon The Doc's assigned Counsel by first class mail.



Michael Baez WB9027

P.O. Box 100

So. Walpole, MA

02071-0100